

FILED

JUN 07 2023

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

ANDREW MOORE,  
JEFFREY SWANSON, and  
DAVID UNDERWOOD,

Defendants.

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No.

4:23CR296-JAR-RHH

## INDICTMENT

**COUNT ONE**

The Grand Jury charges that:

Beginning in or around June 2019 and continuing thereafter through the date of the Indictment, with the exact dates unknown, within the Eastern District of Missouri and elsewhere,

**ANDREW MOORE, and  
JEFFREY SWANSON,**

the Defendants herein, did knowingly and willfully conspire, combine, confederate and agree with each other, and with other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with the intent to distribute anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(b).

**COUNT TWO**

The Grand Jury further charges that:

Beginning in or around July 2020 and continuing thereafter through the date of the Indictment, with the exact dates unknown, within the Eastern District of Missouri and elsewhere,

**DAVID UNDERWOOD, and  
JEFFREY SWANSON,**

the Defendants herein, did knowingly and willfully conspire, combine, confederate and agree with each other, and with other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with the intent to distribute anabolic steroids, Schedule III controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(b).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1), as set forth in Count One the defendant listed shall forfeit to the United States of America any property, real and personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said offenses, and any property used, or intended to be used, in any manner or part to commit or facilitate the commission of said offenses.

2. Subject to forfeiture is a sum of money equal the total value of any property, real or personal involved in transactions or attempted transactions in furtherance of the offenses charged in Count One.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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Stephen Casey, #58879MO  
Assistant United States Attorney